

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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In re : MDL No. 1285
Misc. No. 99-197 (TFH)
VITAMINS ANTITRUST LITIGATION. :

FILED

MAY 15 2002

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This Document Relates to: :

NANCY MAYER WHITTINGTON, CLERK
U.S. DISTRICT COURT

PFFJ, INC. : D.D.C. No. 00 Civ. 2115 (TFH)
v. F. HOFFMANN-LA ROCHE LTD. et al., : (Transferred from D. Ariz.)
:

D&D FARMS, INC. : D.D.C. No. 00 Civ. 2117 (TFH)
v. F. HOFFMANN-LA ROCHE LTD. et al. : (Transferred from D.S.D.)
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TFH
STIPULATION AND ~~PROPOSED~~ ORDER

IT IS HEREBY STIPULATED AND AGREED, by and between the
plaintiffs and the defendants appearing in the PFFJ and/or D&D Farms actions, as follows:

1. The Court's Order entered March 21, 2002, Re: Third Pretrial Schedule
shall not apply to these two state-law indirect-purchaser cases, nor shall it apply to any other
state-law indirect-purchaser actions that may subsequently become part of these proceedings;

2. At the first MDL status conference held on or after August 15, 2002,
the concerned parties will make proposals for pretrial scheduling in these cases. The parties
will confer in advance and it is expected that the schedule to be proposed will coordinate
proceedings in these cases with the scheduling of the scores of indirect-purchaser cases
pending in state courts across the country;

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3. The moving defendants in *PFFJ* may have through May 31, 2002, to serve supplemental papers on their motion to dismiss. Plaintiff may have through June 28, 2002, to serve a response. Defendants may have through July 13, 2002, to serve any reply; and,

4. No defenses are waived by participation in this stipulation.

Dated: May 8, 2002

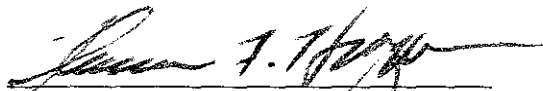
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*Attorneys for defendant Lonza Inc. and
(for purposes of this stipulation only)
on behalf of all defendants appearing
in the PFFJ and/or D&D Farms actions*

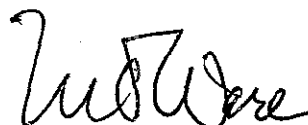
SO ORDERED, May 14, 2001:



Hon. THOMAS F. HOGAN
Chief United States District Judge

CERTIFICATE OF SERVICE

The undersigned member of the Bar of this Court hereby certifies that on May 8, 2002, he caused the foregoing STIPULATION AND [PROPOSED] ORDER to be served on all MDL counsel in accordance with the Order Regarding Electronic Service entered May 17, 2000.



MICHAEL O. WARE